

THE HONORABLE THOMAS S. ZILLY

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON**

KEVIN PINE, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

A PLACE FOR MOM, INC., a Delaware
corporation,

Defendant.

Case No. 17-cv-1826

**JOINT STIPULATION OF THE PARTIES
AND ORDER TO EXTEND CERTAIN
DEADLINES**

1 Pursuant to Federal Rule of Civil Procedure 6, Plaintiff Kevin Pine (“Plaintiff”) and
2 Defendant A Place for Mom, Inc. (“Defendant”) (collectively, the “Parties”), by their respective
3 attorneys, hereby enter into this Stipulation to extend the time for Plaintiff to seek class
4 certification based on the following facts:

5 WHEREAS, this class action lawsuit was filed by former named plaintiff Andrew Kim in
6 the United States District Court for the Northern District of Illinois on August 7, 2017. *See* Dkt.
7 1. On December 5, 2017, this case was transferred to this Court. *See* Dkt. 34. On February 12,
8 2018, the parties served their initial discovery disclosures upon each other.

9 WHEREAS, on February 2, 2018, Plaintiff served interrogatories and requests for
10 production of documents on Defendant. Defendant served its responses and objections to
11 Plaintiff’s interrogatories and requests for production on March 12, 2018, and supplemental
12 responses and objections on March 30, 2018.

13 WHEREAS, the parties have held three telephonic conferences in order to meet and
14 confer about Defendant’s discovery responses. To date, Defendant has produced approximately
15 180 pages of additional documents in response to Plaintiff’s discovery requests, but Defendant
16 anticipates producing additional documents.

17 WHEREAS, on March 5, 2018 Defendant served interrogatories and requests for
18 production on Plaintiff. Plaintiff served his discovery responses on Defendant on April 4, 2018.
19 The parties met and conferred about these responses on April 10, 2018.

20 WHEREAS, Plaintiff served subpoenas on two vendors that performed services for
21 Defendant. Defendant recently disclosed the existence of another vendor, which may require
22 issuance of an additional subpoena.

23 WHEREAS, the parties each served deposition notices and are in the process of
24 scheduling depositions for a time after relevant documents have been produced.

25 WHEREAS, on February 16, 2018, this Court entered an Order setting a schedule for
26 discovery and trial. Dkt. 63. Under that schedule, class certification discovery is set to close on

1 April 23, 2018. However, given the status of defendant's investigation into the remaining
2 documents to be produced by Defendant, the pending non-party discovery, and the depositions
3 that will occur after additional documents have been produced, Plaintiff and Defendant believe
4 that a modest extension of the class certification discovery deadline would best facilitate the
5 efficient prosecution of this action.

6 NOW THEREFORE, Plaintiff and Defendant hereby stipulate and respectfully request
7 that:

8 1. The Court extend the deadline to complete discovery on class certification issues
9 by eight (8) weeks, to June 18, 2018.

10 2. The Court extend the deadline to file any motions related to class certification by
11 four (4) weeks to July 19, 2018.

12 It Is So Stipulated Through Counsel of Record,

13
14 A PLACE FOR MOM, INC.

KEVIN PINE

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16 By: /s/ James F. Williams
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By: /s/ Sharon M. Lee
Sharon M. Lee, WA Bar No. 37170

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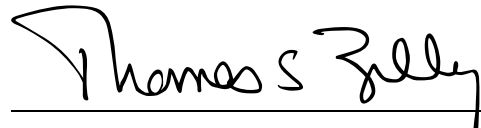
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Counsel for Plaintiff and the Proposed Class

IT IS SO ORDERED.

Dated this 18th day of April, 2018.



Thomas S. Zilly
United States District Judge